

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

JOHN RE,

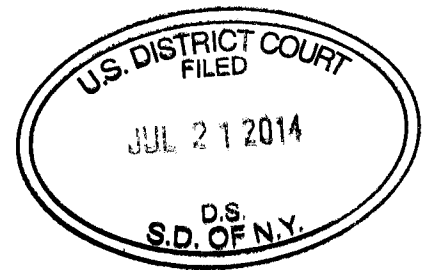
Defendant.

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State of New York)
County of New York : ss.:
Southern District of New York)

Application For
Order of Continuance

14 Mag. 1391



Andrew C. Adams, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Preet Bharara, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. §3161(h)(7)(A).

2. The defendant was charged in a complaint dated June 19, 2014, with a violation of Title 18, United States Code, Sections 1343 and 2. The defendant was arrested on June 20, 2014, and was presented before Magistrate Judge Ronald L. Ellis on that day. At the initial presentment, the defendant was represented by Annalisa Miron, Esq. and was released on bail.

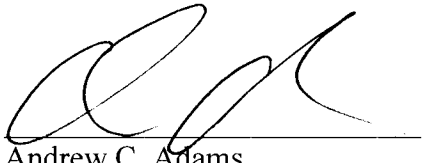
3. At the initial presentment, defense counsel consented to a waiver of the right pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure to a preliminary hearing within 14 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until July 21, 2014, within which to file an indictment or information.

4. Defense counsel and I have had discussions regarding a possible disposition of this case, and those discussions continue. However, I do not anticipate a resolution of our negotiations before the deadline under the Speedy Trial Act expires on July 21, 2014.

5. Therefore, the Government is requesting a 30-day continuance until August 20, 2014, to continue the foregoing discussions and, potentially, reach a disposition of this matter. I have communicated with defense counsel, who specifically consented to this request.

6. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
July 21, 2014



Andrew C. Adams
Assistant United States Attorney
(212) 637-2340

